

Juan C. Chavez, OSB #136428
Benjamin Haile, OSB#040660
Franz H. Bruggemeier, OSB #163533
Oregon Justice Resource Center
PO Box 5248
Portland, OR 97208
Telephone: 503-944-2270
Facsimile: 971-275-1839

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

MARK WILSON

Plaintiff,
v.

JERRY PLANTE, RONNIE FOSS, CRAIG
PRINS, JOSH HIGHBERGER, and
JOHN DOES 1-10.

Defendants.

Case No. 6:21-cv-01606-SI

DECLARATION OF COUNSEL

I, Juan C. Chavez, submit the following declaration:

I am the counsel of record for the Plaintiff, Mark Wilson, and I make this declaration in support of Plaintiff's Motion for Extension of Case Deadlines. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

1. Plaintiff anticipates filing an amended complaint within the next week that will likely alter Defendants' position and arguments in their Rule 12(c) motion, and this would be a more efficient means

of presenting these issues to the Court.

2. I have attempted to confer by email with the Counsels for Defendants, Kenneth Crowley and Shannon Vincent, regarding this motion, and Defendants' counsel has not yet responded.

I hereby declare that above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 4, 2022

/s/ Juan C. Chavez
Juan C. Chavez, OSB #136428
PO Box 5248
Portland, OR 97208